

EXHIBIT B

Chang, Esther Kim

From: James Judah <jamesjudah@quinnemanuel.com>
Sent: Tuesday, July 18, 2017 10:48 AM
To: Edward Takashima; Andrea P Roberts; QE-Waymo
Cc: UberWaymoMoFoAttorneys; BSF_EXTERNAL_UberWaymoLit; 'DG-GP Otto Trucking Waymo'; 'John Cooper (JCooper@fbm.com)'; 'Matthew Cate (MCate@fbm.com)'
Subject: RE: Waymo: Deposition Scheduling

- External Email -

Counsel –

Waymo requests the depositions of David Bonderman and Arianna Huffington. We seek their depositions because they received the due diligence report. Also, as member's Board of Directors, they are expected to have knowledge of Uber's business plans and strategy for its self-driving car program, reasons why the Board approved the acquisition of Otto, what information was disclosed to the Board before that decision was made, and what Uber knew and when they knew it. Ms. Huffington also reportedly had conversations with Mr. Kalanick related to the Board's push for his removal as CEO, which in turn was reportedly based at least in part on the Otto acquisition and the resulting litigation. (<https://www.nytimes.com/2017/06/21/technology/uber-travis-kalanick-final-hours.html>; <https://www.bloomberg.com/news/articles/2017-06-22/kalanick-s-ouster-as-uber-ceo-began-with-a-hand-delivered-letter>.) We would like to depose them in early-to-mid August. Please let us know whether Uber will make them available for deposition.

Best,
James

From: Edward Takashima [<mailto:etakashima@BSFLLP.com>]
Sent: Friday, July 14, 2017 9:05 PM
To: Andrea P Roberts <andreaproberts@quinnemanuel.com>; QE-Waymo <gewaymo@quinnemanuel.com>
Cc: UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; BSF_EXTERNAL_UberWaymoLit <BSF_EXTERNAL_UberWaymoLit@BSFLLP.com>; 'DG-GP Otto Trucking Waymo' <DG-GPOttoTruckingWaymo@goodwinlaw.com>; 'John Cooper' (JCooper@fbm.com)' <JCooper@fbm.com>; 'Matthew Cate' (MCate@fbm.com)' <MCate@fbm.com>
Subject: Waymo: Deposition Scheduling

Andrea,

I write with more progress on deposition scheduling.

We understand from his counsel that Eric Friedberg is available for deposition on August 24. The location is TBD but will likely be New York or Chicago.

Uber witnesses are available as follows:

- John Bares: August 11 in Pittsburgh (as requested)

- Don Burnette: August 18 (as requested)
- Cameron Poetzscher: August 11 (as requested)
- Nina Qi: August 10 (as requested)

In addition to the above, please let us know if we can confirm the following per our prior emails:

- Jeff Holden: August 15
- Eric Tate: August 2
- Colin Sebern: August 15

For Waymo's witnesses, we are of course willing to work with Waymo on scheduling around witnesses' conflicts, but there has to be some balancing between the witnesses' schedules and the needs of the case. As a result, for some depositions we are requesting alternate dates.

- Jai Krishnan (Waymo proposed July 20): We believe this date is too early because Mr. Krishnan's deposition will be significantly affected if Judge Corley grants Uber's MTC with respect to RFP 119. We request a later date for Mr. Krishnan, preferably on the week of July 24.
- Gerard Dwyer (Waymo proposed August 9): We confirm August 9.
- Scott Brown (Waymo proposed July 25): We ask to depose Mr. Brown after Mr. Gudjonsson. We can address this date after we have a date for Mr. Gudjonsson.
- Dan Chu (Waymo proposed August 24): We confirm August 24.

Edward H. Takashima

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